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Proposed Counsel for Marlene G. Weinstein,  
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SANTA ROSA DIVISION

In re

R AND R MARKETING SERVICES, LLC  
*dba* FLY WITH WINE,  
Debtor.

Case No. 24-10368 WJL  
Chapter 7  
Hon. William J. Lafferty  
[No Hearing Requested]

**APPLICATION FOR ORDER AUTHORIZING EMPLOYMENT OF COUNSEL**

Marlene G. Weinstein, Chapter 7 Trustee of the estate of the above Debtor, files this application for an order authorizing her to employ Rincon Law, LLP, as her general counsel in the above case under 11 U.S.C. § 327(a).

The Trustee wishes to employ Rincon Law, LLP as her general counsel in connection with all matters relating to the above Chapter 7 case, including but not limited to:

- a) Assistance and advice to the Trustee on legal aspects involved in the investigation, collection, and liquidation of assets or potential assets of the bankruptcy estate, and in connection with the Trustee's other duties under the Bankruptcy Code;
- b) Assistance and advice to the Trustee regarding transfers that may be avoidable under the provisions of the Bankruptcy Code or other applicable law;

- c) Representation of the Trustee in litigation the Trustee determines is necessary;
- d) Assist the Trustee in analysis and objection to claims if the Trustee determines action is necessary after the Trustee's initial review of claims; and
- e) Attendance at Court hearings as necessary.

Applicant proposes to retain Rincon Law, LLP, on the basis of its expertise in bankruptcy law and believes that the retention of counsel is necessary and is in the best interest of the bankruptcy estate. Applicant has submitted the Declaration of Charles P. Maher in support of the application.

Rule 6003(a) of the Federal Rules of Bankruptcy Procedure provides that professionals should not be employed earlier than 21 days after the petition date absent exigent circumstances. Exigent circumstances exist in this case. A lease of premises is causing accrual of administrative rent and the Debtor's filing has disrupted a recent sublease to a third party; the landlord is willing to terminate the lease. There are other leased premises that are accruing administrative rent. The Trustee has received an expression of interest in a purchase of assets. Some assets appear to be over-encumbered and early abandonment may be necessary. The Trustee will need immediate legal assistance.

Rincon Law, LLP is a small firm situated in San Francisco. To the best of the Trustee's knowledge, Rincon Law, LLP has no connection with the Debtor, creditors, or any other party in interest in the bankruptcy case, their attorneys or accountants, the United States Trustee or any person employed in the Office of the United States Trustee, except as set forth in the declaration of proposed counsel filed in support of this application. Rincon Law, LLP does not represent any interest adverse to the Trustee or to the estate and is a disinterested person in this case.

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1 Rincon Law, LLP generally charges on an hourly rate basis. The current hourly rates charged  
2 by attorneys at Rincon Law, LLP are set forth below. Rates are subject to change from time to time  
3 but not more than once per year.

4 Attorney	Hourly Rate
5 Charles P. Maher	\$600
6 Gregg S. Kleiner	\$600
7 Jeffrey L. Fillerup	\$600

8 Rincon Law, LLP's billing practices are identical for bankruptcy and non-bankruptcy clients.  
9 The hourly rates on which Rincon Law, LLP bases its fees are the same for bankruptcy and non-  
10 bankruptcy clients but can be higher for non-bankruptcy clients than in court-appointed  
11 representations.

12 All fees and expense reimbursement are subject to Court approval on notice to creditors and  
13 other parties-in-interest.

14 Based on the Declaration of Charles P. Maher, Applicant is informed and believes that  
15 Rincon Law, LLP, is in compliance with the Bankruptcy Court's Guidelines for Compensation and  
16 Expense Reimbursement of Professionals and Trustees. It does not charge for word processing or  
17 incoming telecopy costs. Outgoing faxes will be charged at cost. It charges \$0.20 per page for  
18 photocopying. Other clients are charged varying rates for reimbursement of that expense. Rincon  
19 Law, LLP charges other expenses at its cost.

20 Based on the Declaration of Charles P. Maher, Applicant is informed and believes that  
21 Rincon Law, LLP, neither holds nor represents an interest adverse to the estate, is a disinterested  
22 person in this case, and is qualified to serve as Applicant's general counsel.

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WHEREFORE, the Trustee requests entry of an order authorizing her to employ Rincon Law, LLP as her general counsel in the above case under 11 U.S.C. § 327(a).

DATED: July 15, 2024

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Marlene G. Weinstein, Chapter 7 Trustee

DATED: July 15, 2024

RINCON LAW, LLP

By: /s/Charles P. Maher  
Charles P. Maher  
Proposed Counsel for Marlene G. Weinstein,  
Chapter 7 Trustee